

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

Santana Bryson and Joshua Bryson,
as Administrators of the
Estate of C.Z.B., and as surviving
parents of C.Z.B., a deceased minor,

Plaintiffs,

v.

Rough Country, LLC

Defendant.

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Civil Action File

No. 2:22-cv-17-RWS

**PLAINTIFFS' SECOND AMENDED NOTICE OF VIDEOTAPED
DEPOSITION OF KEN DUNN FOR USE AT TRIAL**

**TO: Ken Dunn
CEO, Rough Country, LLC
c/o Richard H Hill, II, Esq.
Lindsay G. Ferguson, Esq.
Claire C. Murray, Esq.
Aaron B. Chausmer, Esq.
Weinberg, Wheeler, Hudgins, Gunn & Dial, LLC
3344 Peachtree Road, NE, Suite 2400
Atlanta, GA 30326**

COMES NOW the Plaintiffs in the above-captioned matter and hereby
notice the trial videotaped deposition of Ken Dunn. The deposition will begin
Wednesday, April 2, 2025, at 10:00 a.m. (CDT) at Veritext Court Reporting
located at 236 Adams Avenue, Memphis, TN 38103. The deposition will be by
oral examination, on cross-examination, before an officer duly authorized to

administer oaths for all purposes permitted by the Federal Rules of Civil Procedure including use at trial. The deposition will be recorded by stenographic and audiovisual means.

Respectfully submitted this 28th day of March, 2025.

CANNELLA SNYDER LLC

/s/ Tedra L. Cannella

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rules 5.1(B) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font and size requirements and is formatted in 14-point Times New Roman font.

CANNELLA SNYDER LLC

/s/ Tedra L. Cannella

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *PLAINTIFFS' SECOND AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF KEN DUNN FOR USE AT TRIAL* was electronically filed with the Clerk of Court via CM/ECF, which will automatically serve the following attorneys of record:

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This 28th day of March, 2025.

CANNELLA SNYDER LLC

/s/ Tedra L. Cannella
Tedra L. Cannella
Georgia Bar No. 881085
Attorney for Plaintiffs